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JEFFREY RUTLEDGE,

Plaintiff,

v.

INTERNATIONAL LONGSHOREMEN'S
ASSOCIATION, AFL-CIO, NEW YORK
SHIPPING ASSOCIATION, INC., LOCAL
1233, MAHER TERMINALS, LLC,
BERNARD DUDLEY, GERARD CROTTY,
JOHN DOES 1-10, and ABC CORPS. 1-10,

Defendants.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Civil Action No. 2:14-cv-05589-CCC-MF

CIVIL ACTION

**NOTICE OF CROSS-MOTION FOR
LEAVE TO FILE AN AMENDED
COMPLAINT**

TO:

Clerk, U.S. District Court
District of New Jersey
Martin Luther King Building
50 Walnut Street, Room 4015
Newark, NJ 07101

Honorable Claire C. Cecchi, U.S.D.J.
Martin Luther King Building
50 Walnut Street, Courtroom 2B
Newark, New Jersey 07101

James R. Campbell, Esq.
The Lambos Firm, LLP
599 Avenue C
Bayonne, New Jersey 07002

John P. Sheridan, Esq.
Marrinan & Mazzola Mardon, P.C.
26 Broadway, 17th Floor
New York, New York 10004

PLEASE TAKE NOTICE that Randy P. Davenport, Esq., attorney for Plaintiff Jeffrey Rutledge, will apply to the above-named Court, on Cross-Motion returnable on January 20, 2014 at 9:00 a.m., or at such other time as the Defendants' Motion to Dismiss shall be heard, for the

entry of an Order, pursuant to Federal Rule of Civil Procedure 15, granting leave to file an amended Complaint.

PLEASE TAKE FURTHER NOTICE that the said Defendant shall rely on the enclosed Certification of Counsel, and the Plaintiff's Brief in Opposition to the Motion to Dismiss and In Support of the Cross-motion to Amend;

PLEASE TAKE FURTHER NOTICE that a proposed form of Order, and a proposed form of First Amended Complaint, are annexed hereto;

PLEASE TAKE FURTHER NOTICE that oral argument is requested only if this Cross-Motion is opposed.

LAW OFFICE OF RANDY P. DAVENPORT

Dated: December 29, 2014

By: Randy P. Davenport, Esq. /s//^{Nal}
Randy P. Davenport, Esq.
Attorney for Plaintiff Jeffrey Rutledge